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Practicality in Practice

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April 14, 2006

By E-mail and First-Class Mail

Patrick Sorek, Esq.
Leech Tishman Fuscaldo & Lampl, LLC
Citizens Bank Building, 30th Flr.
525 William Penn Place
Pittsburgh, PA 15219

Re: Brown v. Hamot Medical Center

Dear Pat:

I am writing to request that you immediately withdraw Dr. Brown's Opposition to the Motion to Quash that was filed with the Court today. As you no doubt know, attached to the opposition are several documents marked "Confidential." These documents are subject to the Confidentiality Order that was entered into by the parties in this case and which expressly provides as follows:

Confidential documents should not be filed with the Clerk, except when essential in connection with dispositive motions or other motions under the Federal Rules of Civil Procedure. If filed, they shall be filed under seal and shall remain sealed while in the office of the Clerk so long as they retain their status as confidential documents.

See Confidentiality Order at ¶ 6.

Prior to filing Dr. Brown's Opposition, you made no effort whatsoever to establish that the confidential documents attached thereto are in any way "essential," nor could you successfully do so. Indeed, the attached records merely reflect facts that plaintiff states in her Opposition. Given that these facts have not been disputed, there was no need for attaching them. Rather, it appears that their inclusion was aimed solely at causing embarrassment to Hamot and other individuals who are not parties to this action.

Therefore, in the event you do not withdraw your opposition first thing on Monday morning and see to it that all confidential documents filed along with it are

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**EXHIBIT
"B"**

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removed from the Court's files or destroyed, we will file the appropriate motion with the Court.

If you have any questions, please call me.

Sincerely,

/s/

Kerry M. Richard

Cc: Mark Kuhar, Esq.
Dana Ashley